

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION**

AMERICAN INTERNATIONAL GROUP, INC., <u>et al.</u> ,	)	
	)	
Plaintiffs,	)	Case No. 07 CV 2898
	)	
v.	)	
	)	Judge Robert W. Gettleman
ACE INA HOLDINGS, INC., <u>et al.</u> ,	)	
	)	
Defendants	)	Magistrate Judge Sidney I. Schenkier
<hr style="border: 0.5px solid black;"/>	)	
LIBERTY MUTUAL INSURANCE COMPANY, <u>et al.</u> ,	)	
	)	
Counter-Claimants,	)	
	)	
v.	)	
	)	
AMERICAN INTERNATIONAL GROUP, INC., <u>et al.</u> ,	)	
	)	
Counter-Defendants.	)	
<hr style="border: 0.5px solid black;"/>	)	
SAFECO INSURANCE COMPANY OF AMERICA and OHIO CASUALTY INSURANCE COMPANY, individually, and on behalf of a class consisting of members of the National Workers Compensation Reinsurance Pool,	)	Case No. 09 CV 2026
	)	
Plaintiff,	)	Judge Robert W. Gettleman
	)	
v.	)	Magistrate Judge Sidney I. Schenkier
	)	
AMERICAN INTERNATIONAL GROUP, INC., et al.,	)	
	)	
Defendants.	)	

**NOTICE OF MOTION**

To: All Counsel of Record



**PLEASE TAKE NOTICE** that on Thursday, January 20, 2011 at 8:30 a.m., we shall appear before Magistrate Judge Sidney I. Schenkier or any judge sitting in his stead in Room 1700 of the United States District Courthouse, 219 South Dearborn Street, Chicago, Illinois, and shall then and there present **MOTION TO MODIFY THE PROTECTIVE ORDER, FILED UNDER SEAL**, a copy of which was served upon you on January 14, 2011.

Dated: January 14, 2011

Respectfully submitted,

SAFECO INSURANCE COMPANY OF  
AMERICA AND OHIO CASUALTY  
INSURANCE COMPANY

By: s/ Gary M. Elden  
One of Its Attorneys

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**CERTIFICATE OF SERVICE**

The undersigned attorney hereby certifies that on January 14 , 2011, I caused a true and correct copy of the foregoing **NOTICE OF MOTION** to be filed with the Clerk of the Court and served using the CM/ECF e-filing system upon all counsel of record.

s/ Gary M. Elden  
Gary M. Elden